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UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

BALLOU, CARLA,

Plaintiff,

vs.

UNIVERSAL HEALTH SERVICES, INC.,

Defendant.

Case No. 2:21-cv-01873-APG-DJA

**STIPULATION AND ORDER TO
EXTEND TIME TO RESPOND TO
COMPLAINT**

(THIRD REQUEST)

Pursuant to LR IA 6-1, Defendant Universal Health Services, Inc., by and through its attorneys, Marcus Lee, Esq. and Marcus Smith, Esq. of Lewis Brisbois Bisgaard & Smith, LLP, and Plaintiff Carla Ballou, by and through her attorney Jenny Foley of HKM Employment Attorneys LLP, hereby submit this Stipulation to Extend Time to Respond to Complaint.

Plaintiff served the Complaint on December 3, 2021, and, as such, the deadline to respond to the Complaint was December 27, 2021 (as December 24, 2021, was a federal holiday, and December 25 and 26, 2021, were a Saturday and Sunday, respectively).

The parties hereby stipulate that the deadline for Defendant to respond to the Complaint will be extended from March 22, 2022, to **March 29, 2022**. The extension will allow newly assigned counsel the opportunity to fully investigate the Complaint and prepare an appropriate response.

The failure to file this Stipulation before the deadline expired was the result of excusable

neglect. Defendant was not aware that the Complaint was served and counsel for Defendant, Marcus Smith, discovered a response to the Complaint had not been filed when he was assigned to the case late last week after commencing employment with Lewis Brisbois Bisgaard & Smith, LLP.

This is the third stipulation for extension of time to file a response to the complaint.

Dated this 21st day of March, 2022

HKM EMPLOYMENT ATTORNEYS,
LLP

/s/ Jenny Foley

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IT IS SO ORDERED:



DANIEL J. ALBREGTS
UNITED STATES MAGISTRATE JUDGE

DATED: March 22, 2022